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arranging a substrate on which one or more conductors are printed on the periphery of the opening;

providing one or more first terminals by extending and folding the conductor on an inner part of the opening;

providing one or more second terminals on the second device corresponding to the first terminal on the first device; and

making the first terminals and the second terminals respectively come into contact by fitting the second device into the opening.

Sub 7
3. (Amended) A connection method according to claim 1, further comprising the steps of:

providing a positioning member for positioning the second terminals so that the second terminals respectively correspond to the first terminals in the second device; and

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providing a hole into which the positioning member is inserted in the first device.

4. (Amended) A connection method according to claim 1, further comprising the step of inserting one or more annular seal members surrounding the opening between the first device and the substrate and between the second device and the substrate.

Sub 7
34 5. (Amended) A connection structure of a first device and a second device involving an electrical connection, comprising:

an opening on the first device for fitting the second device;

a substrate on which one or more conductors are printed on the periphery of the opening;

C.F.R. § 1.55, it is respectfully requested that the Examiner acknowledge Applicants' claim for priority in accordance with M.P.E.P. § 706.02(b).

The Examiner indicated that the title of the invention is not descriptive, and that a new title is required. Applicants have amended the title to read --METHOD AND STRUCTURE FOR CONNECTING AND ALIGNING ELECTRICAL CONNECTIONS--. Reconsideration is requested.

The Examiner rejected claims 1-8 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Examiner asserted that the terms "opening" and "fitting opening" in claims 1 and 5 are indefinite. Applicants disagree that the aforementioned terms are indefinite. However, solely in the interests of expediting the prosecution of this application, Applicants have amended claims 1, 4, 5 and 8 to clarify those terms. Applicants have also amended other portions of claims 1, 3-5 and 7-8 to improve grammatical clarity, and not for any reasons related to patentability. Withdrawal of this rejection is requested.

The Examiner rejected claims 1-8 under 35 U.S.C. § 102(a) as anticipated by Baur et al. (U.S. Patent No. 6,233,153) issued on **May 15, 2001**. As discussed above, Applicants have made a claim to priority under 35 U.S.C. § 119(a)-(d) by filing in this application, on October 22, 2001, a certified copy of Japanese Patent Application No. 2000-321437, **in English**, with a filing date of **October 20, 2000**. The Examiner is directed to M.P.E.P. § 201.15, which reads:

If the priority papers are already in the file when the examiner finds a reference with the intervening effective date, the examiner will study the papers, if they are in the English language, to determine if the applicant is entitled to the date. If the applicant is found to be entitled to the date, the

reference is simply not used but may be cited to applicant on form PTO-892.

Accordingly, since the priority papers were already in the file when the Examiner found the Baur et al. reference, and the priority papers are in English, the Examiner must determine whether Applicants are entitled to rely on the priority date. As Applicants believe they are entitled to the priority date because the priority document satisfies the enablement and description requirement of 35 U.S.C. § 112, first paragraph, and the present application's priority date of **October 20, 2000** antedates the Baur et al. reference's issue date of **May 15, 2001**, the Examiner may not use the Baur et al. reference to reject under 35 U.S.C. § 102(a). M.P.E.P. §§ 201.15, 706.02(b). Additionally, Applicants also respectfully traverse this rejection.

Independent claims 1 and 5 recite, among other things, "extending and folding the conductor on an inner part of the opening." Baur et al. discloses a subassembly housing for an integral electrical plug unit with connecting pins 11 formed into a cover 1 and contact faces 20 arranged on a circuit board 2. Baur et al. does not disclose either the method by which the conductors 21 are formed on the circuit board 2, as recited in method claim 1, or any conductor that is extended and folded over on an inner part of an opening, as recited in apparatus claim 5. Instead, the conductors 21 simply connect the contact faces 20 with the electrical components 25. (Col. 3, lines 16-20). This layout is repeated in the claims where "metallized bores, connected to the strip conductors, are arranged on the circuit board." (Col. 4, lines 39-40). Because Baur et al. does not disclose, among other things, "extending and folding the conductor on an inner part of the opening", independent claims 1 and 5, and their respective dependent claims 2-4

and 6-8, are patently distinguishable over Baur et al. Withdrawal of this rejection is requested.

The Examiner advised that should claims 1-4 be allowable, claims 5-8 would be objected to under 37 C.F.R. § 1.75 as a substantial duplicate thereof. Applicants respectfully disagree with the Examiner. Claims 1-4 and 5-8 are not substantial duplicates, because claims 1-4 are directed to a **method** while claims 5-8 are directed to an **apparatus**. Both method and apparatus claims may properly be presented in a single patent application where, as in the instant application, they are alternative expressions defining a single invention. Application of Conover, 304 F.2d 680 (CCPA 1962). In addition, the Examiner is advised that there is no statutory basis for asserting a double patenting rejection of claims 5-8, in the event claims 1-4 are allowed. As the Examiner pointed out, 35 U.S.C. § 101 restricts an inventor to a single patent on each independent or distinct invention. However, even a provisional double patenting rejection requires at least two applications by the same applicant. M.P.E.P. § 804. In the instant case, claims 1-4 and 5-8 are in **one patent application** and would be issued in **one patent**. Thus, absent a showing by the Examiner that Applicants have either another application or a patent to the same claimed invention as in the instant application, a double patenting rejection would not be appropriate. Accordingly, should claims 1-4 be allowable, neither an objection to claims 5-8 under 37 C.F.R. § 1.75, nor a rejection of claims 5-8 under 35 U.S.C. § 101 would be appropriate.

In view of the foregoing amendments and remarks, Applicant respectfully requests the reconsideration and reexamination of this application and the timely allowance of pending claims 1-8.

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Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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